



BUNGE CORPORATION

Marine Department

DEPT OF TRANSPORTATION

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P. O. Box 28500

11720 Borman Drive

St. Louis, MO 63146

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125834

April 2, 2001

Docket Management Facility
USCG-1998-3798
U. S. Department of Transportation
Room PL-401
400 Seventh Street, SW
Washington, DC 20590-0001

Re: Proposed Rule
46 CFR Part 66
[USCG-1998-3798] - 14
RIN 2115-AF13
Numbering of Undocumented Barges

Dear Sir or Madam:

Bunge Corporation is a barge owner.

We reiterate the comments contained in our letter dated October 27, 1998, a copy of which is attached.

The proposed rule would require a barge owner to mark its assigned barge number on "the highest part of the vessel's hull or permanent structure such that the number can be seen from either side." *See* Part 66.35(a)(2). This would be in the same area where a barge owner typically marks the name of its barges. Descriptive barge names (*e.g.*, BUNGE 101) are an important means of identifying individual barges for those who operate the barges on a day-to-day basis. If barge owners are required to add a number next to a barge's name, confusion will likely result. It is much easier to discuss a barge named BUNGE 101 or ABCL 1066 than to discuss a barge identified by a string of numbers.

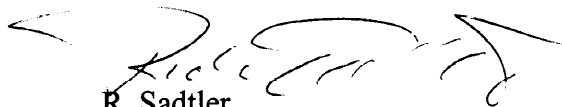
Some have suggested that a barge owner should make (or change) the barge name to be the same as the assigned barge number. This would not be practical. With documented barges, assigned numbers are typically six or more numerals in length, do not have a prefix or suffix, and do not always run consecutively. Barge names, however, are typically one-to-five digit numbers that have independent significance (such as year built, hull depth, cover configuration, sister-ship identification, *etc.*), are preceded by one or more letters that have independent significance (such as "BUNGE" or "ACBL") and are followed by one or more letters that have independent significance (such as "B" to identify a box barge). In addition to losing the descriptive benefits of owner-assigned names, there would be an increased incidence of error because of dealing with more numbers (*i.e.* there is a lower chance of error in communication about a barge when it is named "BUNGE 101" *versus* "7489368"). Moreover, the computer programs and databases used to track barge fleets have been developed and maintained based on owner-assigned names. Requiring owners to change barge names would require costly modifications to the existing software and databases.

Several respondents have stated that the rules for marking undocumented barges should be consistent with the existing rules for marking documented barges, which rules do not require external markings. *See* 46 CFR Part 66 –*Placement of Markings*. The Coast Guard has acknowledged that consistency between the rules is important, but contrary to that acknowledgment has proposed more onerous marking obligations for undocumented barges. If documented barges do not need to be marked externally, we see little reason that undocumented barges should be treated differently. We disagree with the Coast Guard’s justification for this disparate treatment.

We respectfully ask the Coast Guard to reconsider the external marking requirement for undocumented barges, and to make the new rules for undocumented barges consistent with the existing rules for documented barges.

Sincerely,

BUNGE CORPORATION

A handwritten signature in black ink, appearing to read 'R. Sadtler', with a large, sweeping flourish extending to the right.

R. Sadtler

Marine Operations Manager



BUNGE CORPORATION

Marine Department

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October 27, 1998

Docket Management Facility
[USCG-1887-3687]
U. S. Department of Transportation
Room PL-401
400 Seventh Street SW
Washington, DC 20590-0001

Re: Advance Notice of Proposed Rulemaking, 63 FR 36384
Numbering of Undocumented Barges

Dear Sirs:

Bunge Corporation is a barge owner.

The following are our brief comments concerning the proposed rulemaking:

It is stated in the Notice that the cost for a mandatory numbering system is estimated to be from \$7.0 to \$21.0 million. The coast Guard estimate of cleanup costs for abandoned vessels between January 1988 and September 1991 was \$4.4 million, 15% of which was attributable to abandoned barges, or less than \$700,000. Thus, the cost/benefit of a numbering system would appear to weigh heavily against such a system, even if it were successful in reducing the cost of abandoned barge removal. In fact, there are no assurances the system would do anything towards identifying ownership of abandoned barges (all one would have to do is remove the identifying numbers), let alone assure that the barge owner would have the financial ability to pay for removal even if identified. We therefore believe a numbering system, especially a costly one, would be burdensome, disproportionately expensive, of questionable benefit, and should not be required.

That being said, if there must be a system, we believe that numbering should be similar to the existing system for documented barges, that the marking requirements should be identical, and that the same number should remain assigned to the barge throughout its life regardless of ownership. We favor simplified and relaxed requirements regarding proof of ownership and recommend that electronic application and updating be utilized. While from a

Docket Management Facility
[USCG-1998-3798]
October 27, 1998
Page 2

practical viewpoint the cost of marking the vessel would have to be borne by the barge owner, we feel the government should charge no fee.

Sincerely,

BUNGE CORPORATION

R. Sadtler
Marine Operations Manager

RS/cvd
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